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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 William Alvear M.D., and
Elizabeth Alvear,

12 Plaintiff(s),

13 v.

14 United States of America,

15 Defendant.
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Case No.: 24-cv-01777-JCM-DJA

**Stipulation and Order for Extension of
Time to Respond to Plaintiffs'
Complaint (First Request)**

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18 Plaintiffs and Defendants, through their undersigned counsel, stipulate and request
19 that the Court approve an approximately 60-day extension of time, from February 11,
20 2025, to April 14, 2025, for Defendants to respond to Plaintiffs' Amended Complaint,
21 ECF. No. 2. This is the parties' first request for an extension of time.

22 Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1 allow a party to
23 request additional time to perform an act. The subject of this litigation concerns Plaintiffs
24 request to return cash seized during the execution of a search warrant. The parties have
25 come to a resolution in which the parties will file an unopposed motion to authorize the
26 return of the funds from the FBI, less the criminal monetary penalties owed by Plaintiff
27 William Alvear, M.D., in his criminal matter (Case No.: 2:20-cr-00229-CDS-MDC). The
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1 motion has been drafted and will be filed shortly. Pending the outcome of the motion, this
2 litigation may become moot and the parties will seek its dismissal.

3 Based on these circumstances, the parties request an additional 60-day extension of
4 time, from February 11, 2025 to April 14, 2025, for Defendant to file a response to Plaintiffs'
5 Amended Complaint, ECF. No. 2. This stipulated request is filed in good faith and not for
6 the purposes of undue delay.

7 Respectfully submitted this 11th day of February 2025.

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9 DATED: February 11, 2025

DATED: February 11, 2025

10 SUE FAHAMI
11 Acting United States Attorney

12 /s/ Donald J. Green
13 DONALD J. GREEN, ESQ.
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/s/ Summer A. Johnson
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Attorneys for the United States

15 *Attorney for Plaintiffs*

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17 **IT IS SO ORDERED:**

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19 DANIEL J. ALBREGTS
20 **UNITED STATES MAGISTRATE JUDGE**

21 **DATED:** 2/12/2025
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